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REMARKS

Applicant concurrently files herewith an Excess Claim Fee Payment Letter and fee for excess dependent claims.

Claims 1-9, 12-15, and 18-39 are all the claims presently pending in the application. Claims 10-11 and 17 have been canceled. New claims 30-39 have been added to more completely define the present invention.

It is noted that the claims have been amended solely to more particularly point out Applicant's invention for the Examiner, and not for distinguishing over the prior art, narrowing the claim in view of the prior art, or for statutory requirements directed to patentability.

It is further noted that, notwithstanding any claim amendments made herein, Applicant's intent is to encompass equivalents of all claim elements, even if amended herein or later during prosecution.

Claims 1-9, 12, 15 and 28 stand rejected under 35 U.S.C. § 112, second paragraph for informalities. The claims have been amended above to overcome this rejection.

Claim 16 stands rejected under 35 U.S.C. § 101 as claiming the same invention as that of claim 8 of prior (U.S. Patent No. 6,284,087) von Gutfeld et al.

Claims 12-16 stand rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1, 5, 6, and 8 of von Gutfeld et al. (U.S. Patent No. 6,284,087).

Claims 1-6, 18-23, and 27-29 stand rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1, 5, 6, and 8 of von Gutfeld et al. (U.S. Patent No. 6,284,087) in view of the admitted prior art.

Claim 16 stands rejected under 35 U.S.C. § 102(a) and 102(e) as being anticipated by von Gutfeld et al. (U.S. Patent No. 6,179,679).

Claims 12-16 stand rejected under 35 U.S.C. § 102(e) as being anticipated by von Gutfeld et al. (U.S. Patent No. 6,284,087).

Claims 1-9, 12-16 and 18-29 stand rejected under 35 U.S.C. § 103(a) as being obvious over the admitted prior art in view of von Gutfeld et al. (U.S. Patent No. 6,284,087).

These rejections are respectfully traversed in the following discussion.

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I. THE CLAIMED INVENTION

Applicant's invention, as defined for example in a non-limiting embodiment of independent claim 16 (and substantially similarly by independent claims 1, 12, 15, 18, 27, and 29) is directed to a method (and system) of sealing first and second substrates including curing a glue sealing strip provided on a surface of at least one of the first and second substrates with electromagnetic radiation, the surface including transparent and opaque areas, and redirecting light to cure glue areas under the opaque areas.

A feature of the present invention is that the light is diffused by passing through a removable tape fastened to an other surface of the at least one of the first and second substrates.

A further feature of the present invention (e.g., as defined dependent claim 2), is that a coupler (e.g., adhesive) includes a pressure-sensitive adhesive intermediate to a diffuser-substrate interface.

With such features, an adhesive type of tape is provided which requires no coupling agent between it and the substrate to which it is attached. The diffuser (e.g., tape) is easily applied and after processing the diffuser (e.g., tape) is easily removed without damage to the substrate.

The conventional systems, such as those discussed below and in the Related Art section of the present application, do not have such a structure, and fail to provide for such an operation (e.g., see page 5, lines 15-17; page 6, lines 18-23; page 7, lines 19-23; page 8, lines 1-5; and page 20, lines 18-22 of the present application).

Such features are not taught or suggested by any of the cited references.

II. The Double Patenting Rejections

Claim 16 stands rejected under 35 U.S.C. § 101 as claiming the same invention as that of claim 8 of prior (U.S. Patent No. 6,284,087) von Gutfeld et al.

Claims 12-16 stand rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1, 5, 6, and 8 of von Gutfeld et al. (U.S. Patent No. 6,284,087).

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Claims 1-6, 18-23, and 27-29 stand rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1, 5, 6, and 8 of von Gutfeld et al. (U.S. Patent No. 6,284,087) in view of the admitted prior art.

However, the claims are clearly not coextensive in scope.

For example, claim 16 recites "*wherein said light is diffused by passing through a removable tape fastened to an other surface of said at least one of the first and second substrates*". Thus, claim 16 of the present invention is much different from, and is not taught or suggested by, claim 8 of U.S. Patent No. 6,284,087 to von Gutfeld et al.

Further, claim 12 (e.g., upon which claims 13-14 depend) and similarly independent claim 15, has been amended to recite "*wherein said radiation diffuser comprises a removable tape*". Thus, claims 12-16 of the present invention are much different from, and are not taught or suggested by, claims 1, 5, 6, and 8 of von Gutfeld et al. (U.S. Patent No. 6,284,087).

Further, claims 1, 18, 27, and 29 (e.g., upon which claims 2-9, 19-26, and 28 depend), recite "*wherein said radiation diffuser comprises a removable tape*". Thus, claims 1-6, 18-23, and 27-29 are neither taught or suggested by claims 1, 5, 6, and 8 of von Gutfeld et al. (U.S. Patent No. 6,284,087) in view of the admitted prior art.

Thus, Applicant respectfully submits claims 1-9, 12-16, and 18-29 do not claim the same invention as U.S. Patent No. 6,284,087, and are not taught or suggested by U.S. Patent No. 6,284,087, alone or in combination (arguendo) with the admitted prior art.

III. THE PRIOR ART REFERENCES

A. The von Gutfeld '679 Reference

The Examiner asserts:

[regarding claim 16,] von Gutfeld et al. '679 discloses a method of sealing first and second substrates...

However, Applicant respectfully disagrees.

Specifically, nowhere does von Gutfeld '679 teach or suggest the features of the claimed invention.

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Firstly, von Gutfeld '679 does not teach or suggest "*said light is diffused by passing through a removable tape fastened to an other surface of said at least one of the first and second substrates*", as defined by independent claim 16. Instead, von Gutfeld '679 discloses a structure and method which is entirely different from that of the present invention.

For example, in von Gutfeld '679 "[a] uv transmitting block 201 rests on top of substrate 103 and is optically coupled to substrate 103 by a Fluid couplant 202" (e.g., see column 3, lines 20-23 of von Gutfeld '679). This is much different from the removable tape fastened to an other surface of a substrate. A removable tape is not "*a uv transmitting block 201*", and is not taught or suggested thereby.

Further, as defined by new dependent claim 30, the removable tape includes a pressure-sensitive adhesive on a side. This is much different from von Gutfeld '679, as shown in Figs. 1-2, where a Fluid couplant 202 is intermediate to a block 201 and a first glass substrate 103. The "*index matching fluid 202*" of von Gutfeld '679 is much different and does not teach or suggest the removable tape and pressure-sensitive adhesive of the claimed invention. For example, with the novel removable tape with the pressure-sensitive adhesive, the liquid couplant can be avoided and thus processing can be easily performed in a vacuum. Further, after processing, the tape can be easily removed without damaging the substrate.

Hence, turning to the clear language of the claims, there is no teaching or suggestion of "[a] method of sealing first and second substrates comprising:

curing a glue sealing strip provided on a surface of at least one of the first and second substrates with electromagnetic radiation, said surface including transparent and opaque areas; and

redirecting light to cure glue areas under the opaque areas,

wherein said light is diffused by passing through a removable tape fastened to an other surface of said at least one of the first and second substrates" (emphasis Applicant's).

For the reasons stated above, independent claim 16 of the claimed invention is fully patentable over von Gutfeld '679.

Further, new claims 30-31 when taken in combination with claim 16 define additional novel and non-obvious limitations.

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B. The von Gutfeld '087 Reference

The Examiner asserts:

[regarding claim 12-16] von Gutfeld et al. '087 discloses a system, a display, and a method of sealing first and second substrates comprising a first substrate with alternating transparent and opaque regions with respect to incident electromagnetic radiation (ultraviolet) ..(see Figured 6; column 2, lines 31-36; and column 4, line 62 to column 5, line 10).

However, the Examiner's assertions that von Gutfeld et al. '087 anticipate the present invention are erroneous.

Specifically, as shown in Figure 6, in von Gutfeld et al. '087 does not teach or suggest that "*said radiation diffuser comprises a removable tape*", as defined by independent claim 12 (and substantially similarly by independent claims 15 and 16). Instead, von Gutfeld et al. '087 discloses "*in FIG. 6 where a thin glass sheet 50 is placed over the region to be sealed. Glass sheet 50 has its upper face 52 prepared as a diffuse reflector while its lower surface 54 remains smooth. A couplant (not shown) such as wafer or stopcock grease may be used*" (emphasis Applicant's) (e.g., see column 4, lines 62-66 of von Gutfeld et al. '087).

Thus, instead of "*a removable tape*", as defined by the independent claims of the present invention, von Gutfeld et al. '087 teaches a thin glass sheet 50. Further, there is no disclosure in von Gutfeld et al. '087 that the thin glass sheet 50 is removable.

Further, instead of a pressure-sensitive adhesive, as defined by new dependent claim 30 (e.g., and new dependent claims 32 and 34)), von Gutfeld et al. '087 teaches a couplant (e.g., wafer or stopcock grease). This is completely different from a removable tape with a pressure-sensitive adhesive and does not provide the advantages of easy application and removal without damage to a substrate.

Hence, turning to the clear language of independent claim 12 (and substantially similarly by independent claims 15 and 16) there is no teaching or suggestion of "[a] system, comprising:

a first substrate having a region including alternating transparent regions and opaque regions with respect to incident electromagnetic radiation;

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a radiation diffuser at least partially transparent to said incident electromagnetic radiation; and

a coupler for attaching said radiation diffusing element to said first substrate containing said alternating opaque and transparent regions to form a diffuser-substrate interface; and

a second substrate for being coupled to said first substrate,

wherein said radiation diffuser comprises a removable tape" (emphasis Applicant's).

For the reasons stated above, independent claim 12 (and substantially similarly independent claims 15-16) of the claimed invention are fully patentable over Von Gutfeld .

Further, dependent claims 13-14 (and new claims 30-35) when taken in combination with claims 12, 15, and 16 define additional novel and non-obvious limitations.

Further, with regard to 35 U.S.C. 103(a) rejection of claims 1-9, 12-16, and 18-29 as being obvious over the admitted prior art in view of von Gutfeld et al. (U.S. Patent No. 6,284,087).

However, as disclosed above neither the Admitted Prior Art or Von Gutfeld et al. '087, either alone or in combination, teaches or suggests the unique features of the present invention. That is, neither the Admitted Prior Art nor Von Gutfeld et al. '087 teach or suggest "*said radiation diffuser comprises a removable tape*", as defined by independent claims 1, 12, 15, 16, 18, 27, and 29.

Therefore, these references either alone or in combination are much different from the present invention and fail to teach or suggest the claimed invention.

For the reasons stated above, the claimed invention is fully patentable over the cited references.

IV. FORMAL MATTERS AND CONCLUSION

Regarding the drawings objection, Applicant notes that Figure 1 is "Related Art", not "Prior Art" as alleged by the Examiner. This Figure 1 was not necessarily published or known outside the confines of International Business Machines Corporation prior to the

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application. Indeed, Applicant purposely avoided labeling Figure 1 as "Prior Art" to guard against such an eventuality. Thus, to label this Figure as "Prior Art" at this time would be erroneous.

In view of the foregoing, Applicant submits that claims 1-9, 12-15, and 18-39, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0510.

Respectfully Submitted,



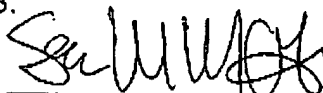
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CERTIFICATION OF FACSIMILE TRANSMISSION

I hereby certify that I am filing this Amendment by facsimile with the United States Patent and Trademark Office to Examiner John T. Haran, Group Art Unit 1733 at fax number (703) 872-9310 this 19th day of August, 2003.



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